

**REMARKS**

Claims 1-50 are currently pending in the application. No new matter has been added.

**I. CLAIM REJECTIONS UNDER 35 U.S.C. § 102**

**Claims 1, 13, 37, 45, and 46**

Claim 1, 13, 37, 45, and 46 stand rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,832,219 issued to Lal et al. (Lal).

For claim 1, there are one or more claimed limitations that are not disclosed, taught or suggested by the cited references.

1. Claim 1 recites “storing a **path string** for the node, wherein the path string comprises a **full path for the node from a root node** of the XML document.” Claims 13, 37, 45 and 46 recite similar limitations. Applicants respectfully submit that Lal discloses storage of a **numeric unique id** and does not disclose storing a **path string** for the node, wherein the path string comprises a **full path for the node from a root node** of the XML document.

According to the Office Action, column 3, lines 62-67, column 4, lines 15-17 and 44-48, column 5, lines 50-51, column 6, lines 15-34 and column 11, lines 20-27 of Lal allegedly discloses storing path information for the node. Lal is directed toward a serialization method that is not based on the hierarchical structure of XML documents (Col. 4, lines 36-42). Lal discloses the assignment of a **unique id** to each node during the serialization process with the root node always having an id of 0 (Col. 5, lines 50-51 and Col. 6, lines 27-30). As shown in the algorithm in column 6, lines 49-52, the unique id in Lal is a **number** similar to a count of nodes (ID = ID + 1). In the Lal preferred

embodiment, the **numeric unique id of the parent node is stored** for each node (Col. 6, lines 15-22).

Applicants respectfully submit that Lal discloses storage of a **numeric unique id** for a node and does not disclose storing a **path string** for the node, wherein the path string comprises a **full path for the node from a root node** of the XML document. Lal identifies nodes and parent nodes based upon unique numeric ids. Lal is *silent* with respect to storage of a **path string** comprising a full path for the node from a root node. To the extent that the Examiner considers the storage of a unique id for the parent to be storage of a path string, the number assigned to the parent id does not provide the full path for the node from a root node. Further, storage of the full path is not necessary in because Lal is directed toward serialization of an XML document that does not rely on the hierarchical structure of XML documents. Thus, Applicants respectfully submit that Lal discloses storage of a **numeric unique id** and does not disclose storing a **path string** for the node, wherein the path string comprises a **full path for the node from a root node** of the XML document.

2. Claims 13, 37, 45, and 46 recite sufficiently the same limitations as claim 1, and therefore, are patentable over Lal.

3. Claims 2-12, 14-21, and 38 are rejected and depend on independent claims 1, 13, 37, 45, and 46, and therefore, are patentable over Lal.

#### Claims 22, 47 and 48

Claim 22, 47, and 48 stand rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,832,219 issued to Lal et al. (Lal).

For claim 22, there are one or more claimed limitations that are not disclosed, taught or

suggested by the cited references.

1. Amended claim 22 recites “producing a result set based upon executing the SQL query, wherein the path string for a node in the computer implemented structure is accessed during execution of the SQL query, and wherein the **path string** comprises a **full path for the node from a root node** of the XML document.” According to the Office Action, column 3, lines 40-61, column 4, lines 10-36, column 7, lines 57-67, column 8, lines 1-48, and column 11, lines 23-38 of Lal allegedly discloses producing a result set based upon executing the SQL query. Applicants respectfully submit that Lal does not disclose a **path string** that comprises a **full path for the node from a root node** of the XML document.

As discussed above, Applicants respectfully submit that Lal discloses storage of a **numeric unique id** for a node and does not disclose storing a **path string** for the node, wherein the path string comprises a **full path for the node from a root node** of the XML document. Lal identifies nodes and parent nodes based upon unique numeric ids. Lal is *silent* with respect to storage of a **path string** comprising a full path for the node from a root node. To the extent that the Examiner considers the storage of a unique id for the parent to be storage of a path string, the number assigned to the parent id does not provide the full path for the node from a root node. Further, storage of the full path is not necessary in because Lal is directed toward serialization of an XML document that does not rely on the hierarchical structure of XML documents. Thus, Applicants respectfully submit that Lal discloses storage of a **numeric unique id** and does not disclose storing a **path string** for the node, wherein the path string comprises a **full path for the node from a root node** of the XML document.

2. Claims 47 and 48 recite sufficiently the same limitations as claim 22, and therefore, are patentable over Lal.

3. Claims 23-34 are rejected and depend on independent claims 22 and therefore, are patentable over Lal.

Claims 35, 36, 49 and 50

Claim 35, 36, 49, and 50 stand rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,832,219 issued to Lal et al. (Lal).

1. Amended claim 35 recites storing the unstructured document in a storage structure in the relational database system, the storage structure corresponding to a universal schema, wherein the storage structure comprises a path string for a node within the unstructured document, wherein the path string comprises a full path for the node from a root node of the XML document.” According to the Office Action, column 3, lines 40-67, column 4, lines 1-36, column 7, lines 57-67, column 8, lines 1-48, and column 11, lines 23-38 of Lal allegedly disclose storing the unstructured document in a storage structure in the relational database system, the storage structure corresponding to a universal schema. Applicants respectfully submit that Lal does not disclose a **path string** that comprises a **full path for the node from a root node** of the XML document.

As discussed above, Applicants respectfully submit that Lal discloses storage of a **numeric unique id** for a node and does not disclose storing a **path string** for the node, wherein the path string comprises a **full path for the node from a root node** of the XML document. Lal identifies nodes and parent nodes based upon unique numeric ids. Lal is *silent* with respect to storage of a **path string** comprising a full path for the node from a root node. To the extent that the Examiner

considers the storage of a unique id for the parent to be storage of a path string, the number assigned to the parent id does not provide the full path for the node from a root node. Further, storage of the full path is not necessary in because Lal is directed toward serialization of an XML document that does not rely on the hierarchical structure of XML documents. Thus, Applicants respectfully submit that Lal discloses storage of a **numeric unique id** and does not disclose storing a **path string** for the node, wherein the path string comprises a **full path for the node from a root node** of the XML document.

2. Claims 36, 49, and 50 recite sufficiently the same limitations as claim 35, and therefore, are patentable over Lal.
3. Claims 36-44 are rejected and depend on independent claims 35, 49, and 50, and therefore, are patentable over Lal.

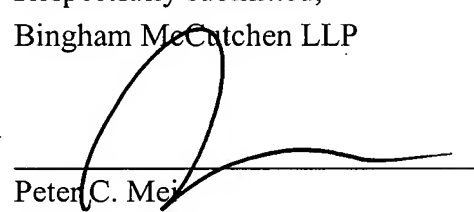
**CONCLUSION**

Based on the foregoing, all remaining claims are believed in condition for allowance. If the Examiner has any questions or comments regarding the remarks, please contact the undersigned at the number listed below.

The Commissioner is authorized to charge any fees due in connection with the filing of this document to Bingham McCutchen's Deposit Account No. **50-4047**, referencing billing number **OI7035852001**. The Commissioner is authorized to credit any overpayment or to charge any underpayment to Bingham McCutchen's Deposit Account No. **50-4047**, referencing billing number **OI7035852001**.

Respectfully submitted,  
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